

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Charlene M. Wood,	)	
	)	
Plaintiff,	)	CIVIL ACTION NO.
	)	04-12183 PBS
vs.	)	
	)	
The Charles Stark Draper Laboratory, Inc.,	)	
	)	
Defendant.	)	

JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1(D)

Now come the Parties, by their respective counsel, and submit herein their Local Rule 16.1(D) Joint Statement:

(1) Discovery Plan -

**January 31, 2005:** Automatic Required Disclosures served.

**June 30, 2005:** Non-expert Discovery completed.

**June 30, 2005:** Plaintiff's Expert Disclosure served.

**July 30, 2005:** Defendants' Expert Disclosures served.

**August 31, 2005:** All expert discovery completed.

The Parties do not believe that phased discovery is appropriate in this action.

(2) Proposed Schedule for the Filing of Motions -

**September 30, 2005:** All motions under Fed.R.Civ.P. 56 filed, with oppositions to be filed within twenty-one days thereafter.

**January, 2006:** The Parties will be ready for trial.

(3) Certifications Signed by Counsel and Authorized Party Representatives -

The said Certifications will be filed by the Parties under separate cover.

Respectfully Submitted,

Charlene M. Wood  
By her attorney,

The Charles Stark Draper Laboratory, Inc.  
By its attorneys,

/s/ Paul F. Wood  
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